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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

2021 DODGE DURANGO UTILITY SRT
HELLCAT, VIN: 1C4SDJH99MC757148,
LICENSE NUMBER: 8YGP548,

Defendant.

2:24-CV-02605-DJC-SCR

ORDER REGARDING CLERK'S
ISSUANCE OF WARRANT FOR ARREST
OF ARTICLES *IN REM*

WHEREAS, a Verified Complaint for Forfeiture *In Rem* has been filed on September 25, 2024, in the United States District Court for the Eastern District of California, alleging that the defendant 2021 Dodge Durango Utility SRT Hellcat, VIN: 1C4SDJH99MC757148, License Number: 8YGP548 (hereafter "defendant vehicle") is subject to forfeiture to the United States pursuant to 21 U.S.C. §§ 881(a)(4) and 881(a)(6) for one or more violations of 21 U.S.C. §§ 841 *et seq.*;

And, the Court being satisfied that, based on the Verified Complaint for Forfeiture *In Rem* and the affidavit of Drug Enforcement Administration Special Agent Matthew T. Clayton, there is probable cause to believe that the defendant vehicle so described constitutes property that is subject to forfeiture for such violation(s), and that grounds for the issuance of a Warrant for Arrest of Articles *In Rem* exist, pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions;

1 IT IS HEREBY ORDERED that the Clerk for the United States District Court, Eastern District
2 of California, shall issue a Warrant for Arrest of Articles *In Rem* for the defendant vehicle.

3
4 Dated: 10/14/24


SEAN C. RIORDAN
United States Magistrate Judge

AFFIDAVIT OF MATTHEW T. CLAYTON

I, Matthew T. Clayton, being duly sworn under oath, depose and state the following:

1. I am a Special Agent of the United States Department of Justice, Drug Enforcement Administration (“DEA”). I have been a DEA Special Agent since September 2004. I am currently assigned to the DEA Sacramento District Office (“SDO”) charged with investigating major drug trafficking organizations operating in the Eastern District of California. I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I was trained as a DEA Special Agent at the DEA/FBI Academy, Quantico, Virginia. During my training, I received special training in the Controlled Substances Act, Title 21 United States Code, including, but not limited to, Sections 841 and 846, Controlled Substance Violations and Conspiracy to Commit Controlled Substance Violations, respectively. I have received special training regarding criminal organizations engaged in conspiracies to manufacture and/or possess with intent to distribute fentanyl, counterfeit pharmaceutical tablets, ecstasy/MDMA, methamphetamine, cocaine, cocaine base, heroin, marijuana, and other dangerous drugs prohibited by law. I received further training in search and seizure law and many other facets of drug law enforcement including clandestine laboratory investigations.

3. As a DEA agent, I have assisted in the execution of search warrants on many occasions for controlled substances and/or related paraphernalia, indicia, and other evidence of violations of federal drug statutes. I have participated in multiple investigations targeting individuals and organizations trafficking fentanyl, counterfeit pharmaceutical tablets, ecstasy/MDMA, cocaine, heroin, marijuana, methamphetamine, and other drugs. During the course of these investigations, I have become familiar with the manner in which drug traffickers use telephones, often cellular telephones, to conduct their illegal operations. I have participated in wire interception cases encompassing multiple telephones and have previously written wire interception affidavits. Furthermore, I have served as both a monitor and wire room supervisor on federal wiretap investigations. Additionally, I have attended the California Department of Justice’s eight-hour wire interception certification course, as set out in California Penal

1 Code § 629.94.

2 4. Through my training, experience, and interaction with other experienced Special Agents,
3 Task Force Agents, and other drug investigators, I have become familiar with the methods employed by
4 drug traffickers to smuggle, safeguard, store, transport, and distribute drugs, to collect and conceal drug
5 related proceeds, and to communicate with other participants to accomplish such objectives. These
6 methods include the use of telephones, pre-paid or debit calling cards, public telephones, wireless
7 communications technology such as paging devices and cellular telephones, counter-surveillance,
8 elaborately planned smuggling schemes tied to legitimate businesses, and use of codes in
9 communications in an attempt to avoid detection by law enforcement. Based on my training and
10 experience, I also know that violators of the controlled substances laws often purchase telephones or
11 subscribe to telephone service using false names and/or other individuals' names to avoid detection by
12 law enforcement.

13 5. This affidavit is made in support of a warrant for arrest of a 2021 Dodge Durango Utility
14 SRT Hellcat, VIN: 1C4SDJH99MC757148, License Number: 8YGP548 (“defendant vehicle”). The
15 defendant vehicle was used or was intended to be used to transport, or in any manner to facilitate the
16 transportation, sale, receipt, possession, or concealment of a controlled substance and it represents
17 proceeds traceable to violations of 21 U.S.C. §§ 841, *et seq.* As a result of the foregoing, the defendant
18 vehicle is subject to forfeiture to the United States pursuant to 21 U.S.C. §§ 881(a)(4) and 881(a)(6).

19 6. The facts in this affidavit are known to me as a result of my personal participation in this
20 investigation, through conversations with other agents and detectives who have participated in this
21 investigation, and from reviewing official reports, documents, and other evidence obtained as a result of
22 the investigation and I have determined the following:

23 7. In late 2021 or early 2022, law enforcement received information that Jawanda and others
24 were trafficking illegal drugs and firearms in Northern California. In 2022, law enforcement engaged in
25 a series of controlled buys of illegal firearms and narcotics from Sukhmanpreet Jawanda (“Jawanda”) that
26 culminated in federal search warrants at Jawanda’s home and other locations linked to his illegal activity.
27 The early 2022 controlled buys included:

28 a. On January 11, 2022, an undercover officer (“UC”) conducted a controlled buy of a

1 polymer 80 semi-automatic Glock 43 style 9mm handgun from Jawanda. Law
2 enforcement observed Jawanda drive a 2021 Dodge Charger (not the defendant
3 vehicle) in Yuba City where he met the UC. At the meet, the UC got into the 2021
4 Dodge Charger and purchased the Glock handgun with a suppressor attached for
5 \$1,000 from Jawanda.

6 b. On February 17, 2022, the UC negotiated the purchase of approximately 2,560
7 counterfeit oxycodone blue M30 pills containing fentanyl for \$5,000 from Jawanda.
8 Law enforcement observed Jawanda drive the defendant vehicle from Sacramento to
9 the meet location in Natomas, park next to the UC, and then enter the right front
10 passenger seat of the UC's vehicle. Jawanda sold the UC a large quantity of
11 counterfeit oxycodone tablets and then exited the UC's vehicle and drove away. As
12 explained below, law enforcement has determined that Jawanda and Joseph Lee
13 Edward Wright ("Wright") traveled to Oregon in February 2022 to purchase the
14 defendant vehicle for over \$80,000 in cash, and Jawanda drove the defendant vehicle
15 back to the meet with the UC to complete the drug transaction.

16 8. On March 25, 2022, the California Highway Patrol conducted a traffic stop of a GMC
17 Sierra Truck driven by Jawanda in Stockton, California. During a search of the GMC Truck, law
18 enforcement found approximately 30,000 counterfeit oxycodone pills containing fentanyl, approximately
19 one kilogram of cocaine, and a loaded semi-automatic handgun.

20 9. On May 12, 2022, federal agents executed a search warrant at a residence associated with
21 Jawanda in Browns Valley, California. During the search of this property, law enforcement found two
22 bags containing gram-quantities of methamphetamine and cocaine, respectively, three bags containing
23 counterfeit oxycodone M30 pills containing fentanyl, approximately 94 suspected marijuana plants, a
24 black rifle with an attached drum style magazine, and the defendant vehicle.

25 10. On May 12, 2022, federal agents also searched a second residence associated with
26 Jawanda, located on 8th Avenue in Sacramento, and found approximately 1068 counterfeit oxycodone
27 M30 pills containing fentanyl.
28

1 11. On April 20, 2023, an Indictment was filed in the Eastern District of California charging
2 Jawanda with two counts of Distribution of Fentanyl in violation of 21 U.S.C. § 841(a)(1), Possession
3 with Intent to Distribute Fentanyl in violation of 21 U.S.C. § 841(a)(1), Possession with Intent to
4 Distribute Cocaine in violation of 21 U.S.C. § 841(a)(1), and Unlawful Dealing in Firearms Without a
5 License in violation of 18 U.S.C. § 922(a)(1)(A).

6 12. On December 7, 2023, Jawanda pleaded guilty to federal drug charges and, on August 1,
7 2024, was sentenced to 120 months in federal prison.

8 13. Law enforcement investigated the purchase of the defendant vehicle and learned that
9 Jawanda and Wright purchased it from an individual in the state of Oregon in February 2022. According
10 to Oregon Department of Motor Vehicle (“DMV”) records, the vehicle was sold to a “Joseph Edward”
11 with an address of 6024 Albert’s Avenue Apt 33, but no city listed. Written on the back of the vehicle’s
12 bill of sale was “Jawanda Sukhmanpreet” and Jawanda’s California Driver’s License number.

13 14. According to California DMV records, the defendant vehicle was registered at the Colusa
14 County DMV on February 16, 2022, to “Joseph Wright.” The address listed for the vehicle’s registration
15 was 6024 Alberta Ave., Apt 33, Marysville, California.

16 15. Law enforcement interviewed the seller of the defendant vehicle and showed them
17 pictures of Wright and Jawanda. The seller confirmed they were the buyers. The seller told law
18 enforcement that he posted the vehicle on an auto selling website and that both Wright and Jawanda met
19 him in Oregon to complete the transaction. To complete the financial piece of the exchange, Wright and
20 Jawanda pulled from their pockets more than \$80,000 in cash.

21 16. Law enforcement interviewed Wright in Reno, Nevada regarding the purchase/sale of the
22 defendant vehicle and showed Wright a photo of Jawanda, which Wright positively identified as
23 “Manny” (a known nickname for Jawanda) who purchased the defendant vehicle from Wright for \$1,600
24 cash in Marysville, California; Wright denied traveling to Oregon to purchase the defendant vehicle with
25 Jawanda.

26 17. According to the California Employment Development Department, there are no records
27 of employment for Jawanda from the start of 2021 through June 2022.

28 18. Based on the foregoing facts, I have probable cause to believe that the defendant vehicle

1 was used to transport illegal drugs and facilitate drug trafficking or is proceeds from drug trafficking. It
2 is respectfully requested that a Warrant for Arrest of Articles *In Rem*, pursuant to the Supplemental Rules
3 for Admiralty or Maritime Claims and Asset Forfeiture Actions Rule G(3)(b)(i), be issued for the
4 defendant vehicle listed above.

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6 /s/ Matthew T. Clayton
MATTHEW T. CLAYTON
Special Agent
7 Drug Enforcement Administration
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9 Sworn to and signed telephonically
10 on this 14th day of October 2024.

11 
12 HON. SEAN C. RIORDAN
United States Magistrate Judge

13 Reviewed and approved as to form

14 /s/ Kevin C. Khasigian
15 Kevin C. Khasigian
16 Assistant U.S. Attorney
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